

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

TECHTRONIC INDUSTRIES COMPANY
LIMITED,

Plaintiff,

– against –

MUDDY WATERS CAPITAL LLC, and
MW DOMINO MANAGEMENT LLC,

Defendants.

Case No. 1:25-cv-00249

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND DEADLINE
TO RESPOND TO DEFENDANTS’ MOTION TO DISMISS**

TO THE HONORABLE DAVID A. EZRA:

Plaintiff, Techtronic Industries Company Limited, hereby moves to extend its deadline to respond to Defendants’ Motion to Dismiss and would respectfully show:

1. Defendants’ Motion to Dismiss was filed on April 22, 2025. Defendants’ Motion to Dismiss raises a number of arguments, including regarding the statute of limitations and sufficiency of the claims.

2. Plaintiff’s current deadline to respond is May 6, 2025.

3. Due to Plaintiff’s counsels’ professional commitments, including a multi-day evidentiary hearing during the period in which the opposition is due, Plaintiff respectfully submits that an extension to May 27, 2025 for Plaintiff to file its opposition to Defendants’ Motion to Dismiss is warranted.

4. Plaintiff seeks this extension in good faith and not for the purposes of delay. Neither party will be prejudiced by the extension.

5. Plaintiff's counsel has conferred with Defendants' counsel, who confirmed that Defendants do not object to this request.

WHEREFORE PREMISES CONSIDERED, Plaintiff respectfully moves the Court to extend the deadline for Plaintiff to respond to the Motion to Dismiss to **May 27, 2025**, and grant such other and further relief to which they may be entitled.

Dated: May 1, 2025.

**QUINN, EMANUEL, URQUHART
& SULLIVAN LLP**

/s/ Asher B. Griffin

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***Attorneys for Plaintiff
Techtronic Industries Company Limited***

LOCAL RULE CV 7(g) CERTIFICATION

Pursuant to Local Rule CV 7(g), I hereby certify that counsel for Plaintiff sought the consent of counsel for Defendants to the relief sought in the foregoing Motion, by telephone on May 2, 2025. Counsel for Defendants consent to the relief sought.

/s/ Asher B. Griffin

Asher B. Griffin

CERTIFICATION OF SERVICE

I certify that on May 2, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

VIA E-MAIL

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/s/ Asher B. Griffin

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